

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
Plaintiff,

v.

PAUL D. CEGLIA
Defendants.

MOTION FOR LEAVE TO FILE
SEALED DOCUMENT

CASE No: 1:12-CR-00876-ALC

ROBERT ROSS FOGG, ESQ., being duly sworn, deposes and says:

1. I am an attorney at law duly licensed to practice in the State of New York and admitted to practice before the Court, with a solo-practice located at 69 Delaware Avenue, Suite 600, Buffalo, New York 14202.

2. I represent the defendant, Paul D. Ceglia, in the above-entitled action brought by the United States of America and as such am familiar with the facts and circumstances of the case from interviews with the defendant, discovery and previous pleadings and proceedings.

3. On November 5, 2014, the Court entered a Text Order denying the government's letter motion requesting an order directing DLA Piper to produce the remaining privileged documents. The Court also directed the defendant to produce a privilege log with respect to the remaining documents to the government and to the Court by November 11, 2014.

4. As the defense has maintained that these documents are confidential and privileged, in compliance with the Court's Order, defendant respectfully requests leave to file the documents under seal.

Dated: Buffalo, New York
November 11, 2014

Respectfully submitted,

/s/ Robert Ross Fogg
ROBERT ROSS FOGG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
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v.

CASE No: 1:12-CR-00876-ALC

PAUL D. CEGLIA
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2014, I electronically filed defendant's Motion for Leave to File Sealed Document, dated November 11, 2014, on behalf of the interested parties with the Clerk of the District Court using the CM/ECF system.

I hereby certify that on November 12, 2014, a copy of the foregoing was also delivered to the following using the CM/ECF System.

Niketh Velamoor, AUSA
United States Attorney's Office
Southern District of New York
One Street Andrews Plaza
New York, New York 10007

Dated: Buffalo, New York
November 12, 2014

/s/ Robert Ross Fogg
ROBERT ROSS FOGG, ESQ.